RECEIVED FEDERAL ELECTION

Date: July 31, 2013

To: FEC General Counsel's Office

Re: MUR # 6740

RESPONSE TO KARGER FEC COMPLAINT

2013. AUG 1 AH 7: 51

CELA

I, Robert L. Vander Plaats, individually, and as President of The FAMiLY LEADER, Inc., am not a party to any wrongdoing in this matter, and urge the FEC to dismiss Mr. Karger's complaint as frivolous and without any factual support.

Specifically:

- 1. I am over 21 years old, a resident of lowa, have legal authority to bind the Corporation, and have personal knowledge of the facts and circumstances surrounding the matters about which Mr. Karger, as an outsider, has made false allegations in FEC MUR # 6740.
- 2. Neither The FAMILY LEADER, nor I individually, ever solicited or received any money or thing of value from anyone, directly or indirectly, to secure my endorsement of Rick Santorum. I endorsed him based only on his and my shared beliefs for principled profamily leadership, and my assessment that he would make the best President among the entire field of candidates in 2012. The only money National Organization for Marriage transferred to The FAMILY LEADER in 2011 was \$80,000.00 to help sponsor and cover some of the costs of some of our pro-marriage advocacy efforts like our Thanksgiving Family Forum, and are reported on NOM's 2011 tax return.
- 3. Any mention of the need for money was simply stating the fact that my endorsement. two weeks prior to the lowa Caucus vote would have little effect unless it was quickly and thoroughly broadcast to the lowa Caucus voters. Therefore, phone calls, television ads and radio ads needed to be purchased. Realizing the Santorum for President Campaign did not have the resources to maximize the impact of my endorsement, i independently secured the necessary funds via my contacts, post-endorsement, directing their donations to the Leaders for Families Super PAC.
- 4. Evidence of no coordination and no "pay for play" is that Candidate Santorum stated publicly that he first learned of my endorsement via the media at his Dec. 20, 2011 campaign stop in Pella, Iowa. I made my endorsement in Urbandale, Iowa, early on Dec. 20, 2011, independent of all candidates and campaigns.

5. Further, neither The FAMiLY LEADER, nor I individually, ever coordinated funding or any other campaign activity, directly or indirectly, with the Santorum for President Campaign, or any other prohibited person or entity. We were fully aware of the coordination prohibitions, and were scrupulous in abiding by them throughout the campaign cycle. All my fundralsing for Leaders for Families Super PAC was done independently from the Santorum for President Campaign, and no lists were sold, given, or shared in any way with or by the Santorum for President Campaign.

FURTHER AFFIANT SAITH NOT.

I declare and affirm under penalty of perjury that the statements made herein are true and correct to the best of my knowledge, information and belief.

KAREN WILD
Commission Number 733482

Robert L. Vander Plaats, individually, and as President of The FAMILY LEADER

Sworn to and subscribed before me this 31 day of July, 2013.

Notary Public in and for Iowa